

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

POLICEMEN’S ANNUITY AND BENEFIT
FUND OF THE CITY OF CHICAGO,
LABORERS’ PENSION FUND AND
HEALTH AND WELFARE DEPARTMENT
OF THE CONSTRUCTION AND
GENERAL LABORERS’ DISTRICT
COUNCIL OF CHICAGO AND VICINITY,
IOWA PUBLIC EMPLOYEES’
RETIREMENT SYSTEM, and ARKANSAS
PUBLIC EMPLOYEES’ RETIREMENT
SYSTEM,

Plaintiff,

-against-

BANK OF AMERICA, N.A. (as Trustee
Under Various Pooling and Servicing
Agreements), and U.S. BANK NATIONAL
ASSOCIATION (as Trustee Under Various
Pooling and Servicing Agreements),

Defendants.

Case No. 1:12-cv-2865-KBF

JOINT PROPOSED SCHEDULE

Pursuant to Exhibit A(8) of the Pilot Project Regarding Case Management Techniques for Complex Civil Cases in the Southern District of New York Standing Order and subject to Court approval, the parties have prepared the following proposed schedule for this action:

Initial Disclosures pursuant to Rule 26(a)(1)	June 7, 2013
Submission of Joint Electronic Discovery Submission and Proposed Order	June 14, 2013
Motion to certify the class	January 10, 2013
Opposition to motion to certify the class	February 7, 2014
Reply re: motion to certify the class	March 7, 2014
Date for completion of fact discovery, including fact depositions	May 16, 2014
Plaintiffs serve expert reports	June 16, 2014
Defendants serve expert reports	Plaintiffs' proposal: July 16, 2014 Defendants' proposal: August 15, 2014
Date for completion of expert discovery (including expert depositions)	30 days after Defendants serve expert reports
Date for filing of dispositive motions	Within 60 days after completion of expert discovery
Date for exchange of witness lists	Within 30 days after the Court's ruling on dispositive motions
Joint Preliminary Trial Report	Within 60 days after the Court's ruling on dispositive motions
Case Management Conference	Within 90 days after the Court's ruling on dispositive motions

STIPULATED AND AGREED TO:

Date: May 10, 2013

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